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Attorneys for Plaintiffs Jamal Jackson; Jannie Mendez  
(in Action No.4:08-cv-01916-SBA)

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

This document relates to:  
SHAWN MYERS; SARAH MYERS  
Plaintiffs,

v.

CITY AND COUNTY OF SAN  
FRANCISCO, et al.,  
Defendants

JAMAL JACKSON; JANNIE MENDEZ,  
Plaintiffs,

vs.

CITY AND COUNTY OF SAN  
FRANCISCO, a municipal corporation;  
HEATHER FONG, in her capacity as  
Chief of Police for the CITY AND  
COUNTY OF SAN FRANCISCO; JESSE  
SERNA, individually, and in his capacity  
as a police officer for the CITY AND  
COUNTY OF SAN FRANCISCO; GARY  
MORIYAMA, individually and in his  
capacity as a police officer for the CITY  
AND COUNTY OF SAN FRANCISCO;  
and San Francisco police officers and  
employees DOES 1 through 50, inclusive,  
Defendants.

NO. C-08-01163 MEJ

DECLARATION OF ATTORNEY  
FOR PLAINTIFFS REGARDING  
EFFORT TO REACH A  
STIPLATION TO RELATE in  
connection with this  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER CASES  
SHOULD BE RELATED

[Civ. L.R. 3-12]

NO. 4:08-cv-01916-SBA

1 I, Robert C. Cheasty, am competent to testify and if called as a witness I would testify as set forth  
2 below:  
3

- 4 1. I am admitted to the bar in California and before this court, and am the attorney for Plaintiffs  
5 in this action known as Jackson v. City and County of San Francisco.
- 6 2. In compliance with the Local Rules I contacted the City Attorney's office to seek a stipulation  
7 regarding the relating of this case, *JACKSON V. CITY AND COUNTY OF SAN FRANCISCO*,  
8 with the earlier filed case involving the same parties and the same incident, the *MYERS V.*  
9 *CITY AND COUNTY OF SAN FRANCISCO*.
- 10 3. I was directed to Sean Connolly as the Deputy City Attorney handling the *Jackson* case.
- 11 4. I explained that the parties, witnesses and issues in the *Myers* and *Jackson* cases arise from the  
12 identical episode at the parking lot at San Francisco's wharf and the complaints and issues  
13 were virtually the same, using much of the identical language and causes of action.
- 14 5. Mr. Connolly stated he was familiar with both the Myers and Jackson cases and stated that he  
15 was representing the Defendants in both cases. He declined to stipulate to the relating of the  
16 cases.

17 I declare under penalty of perjury that the above is true and correct and that I executed this  
18 declaration under the laws of the State of California at my above office address on August 4, 2008.  
19

20  
21  
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23  
24 /s/  
Robert C. Cheasty  
25 Declarant, Attorneys For Plaintiffs  
26  
27  
28

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